

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN**

NEW RESOURCES CONSULTING, LLC )

Plaintiff )

v. )

INGENESIS, INC. )

Defendant )

**CASE NO. 2:16-cv-01198**

**DECLARATION**

I, Jerred D. Green, state as follows under oath and upon personal knowledge:

1. I currently serve as the Senior Vice President, Supplier Management and Business Analytics, of InGenesis, Inc. I have held this position, or other positions in InGenesis, since 2012.
2. InGenesis is a staffing company, primarily involved in medical staffing, though it provides other staffing and personnel services too.
3. InGenesis' corporate headquarters is in San Antonio, Texas.
4. InGenesis has had no employees or any other types of personnel in Wisconsin since 2013.

InGenesis has not done any business in Wisconsin since 2013. It has had a virtual office space agreement from Davinci Virtual Office Solutions for a virtual office in Green Bay, Wisconsin since January 26, 2016, but it has never used the Wisconsin space. InGenesis has similar virtual suite agreements in other states, but it has no actual office in Wisconsin.

5. InGenesis' only connection to Wisconsin since 2013 is that it received a Commodity Service agreement from the Wisconsin Department of Corrections in May 2014. That agreement gives the Department of Corrections the right to order from InGenesis certain types of medical personnel to provide services at Department of Corrections' facilities. InGenesis registered as a

foreign business corporation in Wisconsin and appointed a registered agent there (Corporate Creations Network, Inc., 4650 W. Spencer Street, Appleton, WI 54914), as of April 15, 2014, as part of the process of obtaining the Department of Corrections' agreement. The Department of Corrections, however, has never ordered any personnel from InGenesis under the Commodity Service agreement.

6. The contract between New Resources Consulting, LLC and InGenesis involved in the litigation between our companies concerned work on InGenesis' PeopleSoft software, which is a system maintained at our offices in San Antonio. None of InGenesis witnesses concerning the matter in dispute live in Wisconsin. Numerous InGenesis employees will be witnesses, and all live in the San Antonio, Texas area. A few non-InGenesis employees who may be witnesses live elsewhere, but work in Texas. Even some of New Resources' personnel which it sent to InGenesis, and which may be witnesses, live in Texas. New Resources sent its personnel to Texas to meet with InGenesis concerning the contract and work at issue. InGenesis never sent anyone to Wisconsin concerning these matters. All of InGenesis' documentation concerning this matter is in San Antonio, Texas. And, the software system itself, which may need to be examined in this matter, is in San Antonio. InGenesis also may be pursuing a counterclaim which will require production of damages documents and witnesses, all of which are in Texas.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 9/13/2016

s/Jerred D. Green  
Jerred D. Green